



October 9, 2020

Via Email

Erick M. Ammon
Environmental Protection Compliance Specialist
Clean Water Program
PADEP Southcentral Regional Office
909 Elmerton Ave.
Harrisburg, PA 17110
eammon@pa.gov

**Re: Industrial Waste 3-A
Hanover Foods Industrial Wastewater Treatment Plant
NPDES Permit No. PA0044741
Penn Township, York County**

Dear Mr. Ammon:

I am writing on behalf of Hanover Foods Corporation ("HFC") in response to a notice of violation from the Department dated August 26, 2020 ("NOV"), addressed to our Cannery Plant Manager, Dave Still (I was copied as HFC's Environmental Manager). The NOV requested HFC's response within 45 days describing the cause of the alleged violations and the steps being taken to prevent recurrence of the violations along with a correction schedule.

As background, HFC's industrial wastewater treatment plant ("IWTP") treats food processing wastewater, the majority of which is discharged to Penn Township's wastewater treatment plant ("WWTP") in accordance with the separate industrial pretreatment permit from the Township. HFC's IWTP has two lagoons that are downstream in the treatment process from its anaerobic digester. Process wastewater is treated in the digester first before settling in the lagoons and further treated by polishing ponds, clarifiers, UV treatment, and, for Lagoon 1, Penn Township's WWTP. Process wastewater is typically discharged from the digester into Lagoon 1, and then flows to Penn Township's WWTP for additional treatment. Depending on operating conditions, process water may be directed or transferred to Lagoon 2, but typical operations maximize flows to Penn Township's WWTP for additional treatment.

Lagoon 2 is used for non-contact cooling water and any additional process water (beyond the Township flow limits). Lagoon 2 discharges to Oil Creek under NPDES Permit No. 0044741. At



the time of the Department's inspection, operations were affected by the dredging of sludge from Lagoon 1, which occurred later this year than usual because of the unique circumstances of 2020. The dredging is performed as annual preventative maintenance and, while this was happening in late June and early July, process water was diverted to Lagoon 2. Due to ongoing work related to controlling the flow to Penn Township's WWTP that lasted into July, HFC did not begin refilling Lagoon 1 with process water again until July 8. At the time of the Department's inspection on July 9, the process water was continuing to flow into Lagoon 1 below normal levels. Lagoon 1 was returned to normal operations on July 13.

With this background in mind, our responses to each of the issues identified in the NOV are outlined below:

1. **PADEP NOV Allegation:** IWTP bioreactor #2 was not operating as designed. The Department observed that the bioreactor was operating at 93.39 degrees Fahrenheit while designed to operate at temperatures above 95 degrees Fahrenheit. Similar issues were noted during the Department's previous inspection on April 16, 2019.

HFC Response: IWTP bioreactor #2 was operating within the design range of 85 to 95 degrees Fahrenheit. While 95 degrees Fahrenheit is optimum temperature at design loading rates, HFC's design engineer has indicated that temperatures as low as 85 degrees Fahrenheit can be utilized at lower-than-design loading rates. On July 8, we were operating well below the design loading rate. In any event, we are in the process of converting the fuel source in the boiler from digester gas/#2 fuel oil to digester gas/natural gas to enhance and maintain higher temperature in the anaerobic digester. HFC previously began working with its air consultant, engaging him on June 8, 2020 to address the conversion of the fuel source in the boiler from #2 fuel oil to natural gas. HFC submitted a request for determination (RFD) to this effect to the Department on August 7, 2020. The Department approved the RFD for the conversion of the IWTP boiler to natural gas without needing a plan approval on August 10, 2020. Currently, we are in the process of completing that conversion. Expected completion date is on or before November 30, 2020.

2. **PADEP NOV Allegation:** IWTP clarifiers #3 and #4 were not operating as designed. The Department observed rising sludge in the clarifiers and solids carryover into the clarifier effluent weirs, an indication that the solids are not properly wasted to from the IWTP and that the clarifiers were short-circuiting. Similar issues were noted during the Department's previous inspection on April 18, 2019.

HFC Response: We did not observe short-circuiting. While the sludge density index was within optimal range (0.5-1), the waste activated sludge ("WAS") pump was batch



discharging solids to the slurry tank. The blanket height was higher than normal resulting in rising sludge and solids carryover to the weirs. We did not observe excessive solids in the clarifier effluent, and TSS concentration was below 100 mg/L.

To the extent the Department is concerned with these issues or other issues at the IWTP, HFC has also taken the following actions:

- Since May 2020, we have been working with a new chemical supplier to conduct a quarterly review to determine optimal dosages for the coagulant/flocculant with the fluctuating organic loadings to the digester. We have re-configured polymer injection at the clarifiers to allow for better solids settling.
- On July 20, 2020, we began feeding nitrifying bacteria into Lagoon 1 to enhance with the nitrification process.
- Since August 2020, we have been utilizing the surge tank to blend the varying organic loadings in the wastewater for steady-state operation.

We believe the actions above should address the Department's concerns. Thank you for your consideration. You may contact me any time at knavile@hanoverfoods.com.

Sincerely,

Kumar Navile
Manager - Environmental Affairs / Sustainability
Hanover Foods Corporation

cc: Stephanie Kleinfelter, Esq., HFC General Counsel
Dave Still, VP Canning Operations